

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
CASE NO. 21-cr-173 (PJS/DTS)**

UNITED STATES OF AMERICA,

Plaintiff,

v.

1. ANTON JOSEPH LAZZARO,
a/k/a Tony Lazzaro,
a/k/a Tony,
- and
2. GISELA CASTRO MEDINA,
a/k/a Gisela Medina,

Defendants.

**STIPULATION REGARDING
MOTION TO VACATE
RESTRAINTS ON CERTAIN
PROPERTY**

The United States of America and Defendant Anton Lazzaro, through their respective counsel, hereby stipulate as follows with respect to the Defendant's pending Motion to Vacate Restraints on Certain Property.

WHEREAS, on October 28, 2021, Defendant Lazzaro filed a Motion to Vacate Restraints on Certain Property. ECF Nos. 74, 75;

WHEREAS, on December 9, 2021 the District Court issued an Order affirming that the motion would be heard at 1:00 p.m. on December 15, 2021, and requiring the parties to meet and confer regarding the motion on or before 5:00 pm on December 13, 2021; ECF No. 100;

WHEREAS, the parties have met and conferred on December 10, 2021, and have reached a partial resolution of the pending motion;

NOW, THEREFORE, the parties to this stipulation agree as follows:

1. The United States agrees to return the \$371,240 in U.S. Currency that was seized from 201 11th Street South, #1920, Minneapolis, Minnesota, 55402, with property ID No. 27-029-24-14-0589. The United States agrees that it will expedite the return of this property.

2. The remaining issues in the pending Motion to Vacate Restraints on Certain Property are hereby continued and put on the same briefing schedule as the other motions filed in this case and shall be heard at the same time as those motions. Specifically, the parties agree and jointly request that the United States' response shall be filed by January 24, 2022, Mr. Lazzaro's reply shall be filed by February 4, 2022, and the motion shall be heard on February 17, 2022 at 1:00 pm, jointly with the other motions filed in this case.

3. The parties agree that the 2010 Ferrari convertible, VIN ZFF65LJA9A0173846 shall remain in the custody of the United States Marshals Service or its contractors, in indoor storage, pending the resolution of this Motion and that the United States Marshals Service or its contractors shall maintain the condition of the vehicle in its current state while in their custody.

4. The parties agree that they shall have an attorney present at the time of the currently-scheduled hearing at 1:00 pm on December 15, 2021 to answer any questions of the Court, unless the hearing is cancelled by the Court.

5. The parties respectfully request that the Court enter an order approving this stipulation and resetting the hearing date and briefing schedule as described above.

Dated: December 12, 2021

CHARLES J. KOVATS, JR
Acting United States Attorney

/s/ Craig R. Baune

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Dated: December 12, 2021

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